

REMARKS

Claims 1-4, 6-9, 12-17, 19-21 and 23-30 are pending in this application. By this Amendment, claims 15-16, 20, 23 and 25 are amended, claim 18 is cancelled without prejudice or disclaimer and claim 30 is added. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

Applicant sincerely acknowledges the Office Action's indication that claims 1-4, 6-9, 12-15, 17-18, 20-21 and 23-29 define patentable subject matter. However, for at least the reasons set forth below Applicant respectfully submits all pending claims are in condition for allowance.

A. The Office Action rejects claim 15 under 35 U.S.C. §112, second paragraph. Applicant respectfully submits the above amendment obviates the grounds for the rejection. Withdrawal of rejection of claim 12 under §112 is respectfully requested.

B. The Office Action rejects claims 16 and 19 under 35 U.S.C. §102(b) over U.S. Patent No. 5,758,835 to Annen et al. (hereafter Annen). The rejection is respectfully traversed.

With respect to claim 16, Applicant respectfully submits that Annen fails to disclose features recited therein as required under §102. For example, Annen fails to disclose at least features of selectively applying at least one member chosen from a first brake and a second brake to a first reel according to the detected amount of media on the first reel and the second reel, wherein the selectively applying comprises applying only the first brake to the first reel if more media is detected on the second reel than the first reel and combinations thereof as recited. Further, Applicant respectfully submits that Annen does not teach or suggest any modification

to its disclosure that would result in at least features of selectively applying at least one member chosen from a first brake and a second brake and combinations thereof as recited in claim 16.

For at least the reasons set forth above, Applicant respectfully submits claim 16 defines patentable subject matter. Claim 19 depends from claim 16 and therefore also defines patentable subject matter for at least that reason as well as its additionally recited features. Withdrawal of the rejection of claims 16 and 19 under §102 is respectfully requested.

C. Claim 30 is newly added by this Amendment and believed to be in condition for allowance.

CONCLUSION

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned attorney, **Carl R. Wesolowski**, at the telephone number listed below.

Serial No. 10/626,711
Reply to Office Action of **March 22, 2005**

Docket No. LT-0029

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,
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Date: July 5, 2005

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